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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

LOUIS JAMES STOKES,

Defendant.

CASE NO. 2:24-cr-00031-JAM

**FIFTH STIPULATION AND ORDER TO
CONTINUE STATUS CONFERENCE AND
EXCLUDE TIME**

DATE: July 1, 2025
TIME: 9:00 a.m.
COURT: Hon. John A. Mendez

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on July 1, 2025.
2. By this stipulation, defendant now moves to continue the status conference until **September 09, 2025, at 09:00 a.m.**, and to exclude time between July 1, 2025, and September 09, 2025, under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the discovery associated with this case that it has produced thus far includes over 200 pages of investigative reports, DEA laboratory reports, and photographs. Discovery also includes physical evidence including a pill press, chemicals used to manufacture pills, and other related equipment. This discovery has been either produced directly to counsel or, for the physical evidence, will be made available for defense inspection.

1 b) The government has also made available for review mobile phone data belonging
2 to the defendant.

3 c) Further, it is the government's understanding that the defendant is currently
4 progressing through the program at Wellspace and is anticipated to graduate on July 30.

5 d) Counsel for defendant desires additional time review the discovery that has been
6 produced, inspect the physical evidence, and to review the discovery he anticipates receiving
7 from the government in the near future. In addition, defense counsel needs additional time to
8 consult with his client, to review the current charges, to conduct further investigation, and to
9 discuss potential resolutions. Defense counsel will also need more time to determine whether this
10 case will proceed to trial, to prepare pretrial motions in that event, and to otherwise prepare for
11 trial.

12 e) Counsel for defendant believes that failure to grant the above-requested
13 continuance would deny him/her the reasonable time necessary for effective preparation, taking
14 into account the exercise of due diligence.

15 f) The government does not object to the continuance.

16 g) Based on the above-stated findings, the ends of justice served by continuing the
17 case as requested outweigh the interest of the public and the defendant in a trial within the
18 original date prescribed by the Speedy Trial Act.

19 h) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
20 et seq., within which trial must commence, the time period of July 1, 2025 to September 09,
21 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
22 T4] because it results from a continuance granted by the Court at defendant's request on the basis
23 of the Court's finding that the ends of justice served by taking such action outweigh the best
24 interest of the public and the defendant in a speedy trial.

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1 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
2 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
3 must commence.

4 IT IS SO STIPULATED.

5 Dated: June 20, 2025

MICHELE BECKWITH
Acting United States Attorney

7
8 /s/ JAMES R. CONOLLY
JAMES R. CONOLLY
Assistant United States Attorney

10 Dated: June 20, 2025

11 /s/ MICHAEL D. LONG
MICHAEL D. LONG
Counsel for Defendant
LOUIS JAMES STOKES

13
14
15 **ORDER**

16 IT IS SO ORDERED.

17
18 Dated: June 23, 2025

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE